

EXHIBIT C

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July 22, 2021

VIA EMAIL AND
OVERNIGHT MAIL
tblf@pm.me

John Burns
1717 Park Avenue
St. Louis, MO 63104

Re: *Brennan M. Gilmore v. Alexander E. Jones, et al.*
U.S. District Court, Western District of Virginia, Case No. 3:18-cv-00017

Dear Mr. Burns:

We are writing to follow-up on our discussion that occurred at the July 20, 2021, hearing in the above-referenced matter.

Thank you for confirming at that hearing that you have not received or reviewed Jessica Bidgood's phone records from Verizon and that you will comply with the Court's July 16 order regarding those records.

Since the hearing, we have learned that FedEx was not able to deliver the records to your PO Box and so Verizon sent them to 1717 Park Avenue, St. Louis, MO 63104. We understand that there may be a number of law firms located at this address. The envelope does have your name on it, however, and the proof of delivery on the FedEx website says the records were delivered to the "Receptionist/Front Desk."

Could you please retrieve the package from the receptionist and confirm to us when you have done so? Once retrieved we trust you will not open it and will abide by the Court's order to "maintain the Verizon records in a sealed receptacle in a secure location and ... not review those records or distribute or disclose them to anyone, including [your] client, until Bidgood's motion to quash is resolved."

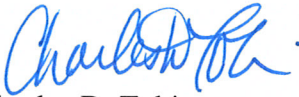
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In addition, and given the Court's decision to quash subpoenas served on other journalists, please let us know if you intend to oppose our motion to quash the subpoena for Bidgood's records. If you do not intend to oppose, we will advise the Court so that it may efficiently grant that motion and order destruction of the records Verizon provided. If you do plan to oppose the motion, we'd like to set a time to meet and confer about why you believe the records are relevant to the case.

Sincerely,

BALLARD SPAHR LLP



Charles D. Tobin

/CDT